REMARKS/ARGUMENTS

Claims 45-52, 54, 58-70, 74-81, 83-92, 96-108 and 112-119 are pending in the application.

Claims 45-52, 54, 58-70, 74-81, 83-92, 96-108 and 112-119 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Lawlor et al. '501. According to the Office Action:

> Lawlor discloses a financial accounting computer 52 (that has more than one file) and a plurality of financial transaction computers 54. The transaction computers 54 are programmed to receive data inputs (via a means for establishing inputs such as a keyboard or data entry device) as claimed and are disclosed as transferring the data inputs (transaction instructions) to the accounting computer 54 (for example see column 7, lines 5-24). The network is 56 and/or 62 (means for transferring the data inputs). The financial transaction computers 54 are programmed to provide interactive access to the file of the accounting computer because it is disclosed that there is a security function that requires users to identify themselves by the use of account numbers and a PIN. This is a way to provide interactive access as claimed (means for providing interactive access). Once the user has access, the user and/or agent can enter data inputs (a new financial transaction such as a transfer of funds or a bill payment), process the data by reviewing the data, adjusting data (changing the amount of a periodic bill that is automatically paid), and deleting data (informing the bank of an incorrect charge that you did not make and having it corrected). A user can perform any and all of the recited functions. Lawlor inherently must have a modem as claimed in claim 91, because one cannot conduct data transfer from one computer to another computer on a network without a modem of some kind. The modem is the device that allows access to the network so that data transfer can occur. It is considered inherent that there is a computer readable medium of some kind (claim 78) that stores the computer programming that "controls" the recited method. An accounting statement is produced as claimed, see column 7, lines 60-63; column 10, lines 24-43; column 14, lines 3-6; and column 15, lines 47-54.

It is submitted that the presently claimed invention is patentable over Lawlor et al. '501. Lawlor et al. '501 discloses a method and system for remote delivery of retail banking services rather than accounting methods and systems as presently claimed. As shown in Figs. 1 and 1A of Lawlor et al. '501, users are provided with remote terminals (54) which communicate

with a central computer (52) in order to allow the users to conduct routine banking functions. Fig. 3 shows the details of one of the remote terminals.

The remote terminal (54) of Lawlor et al. '501 is not a financial transaction computer as recited in independent Claims 45, 61, 78, 80, 83, 99, 116 and 118. As understood by those skilled in the art, a "computer" is "a device that computes, especially a programmable electronic machine that performs high-speed operations or assembles, stores, correlates, or otherwise processes information". *The American Heritage College Dictionary*, Third Edition. In contrast, a "terminal", such as the remote terminal (54) taught by Lawlor et al. '501, is "a device, often equipped with a keyboard and a video display, through which data or information can enter or leave a computer system". *Id.* The remote terminal (54) of Lawlor et al. '501 is connected to a central computer (52), but the remote terminal (54) is not a computer itself. As such, the remote terminal (54) of Lawlor et al. '501 does not read on the presently claimed financial transaction computer as proposed in the Office Action.

Furthermore, the central computer (52) of Lawlor et al. '501 is not a financial accounting computer as presently claimed. As understood by those skilled in the art, the term "accounting" means "bookkeeping methods involved in making a financial record of business transactions and in the preparation of statements concerning the assets, liabilities and operating results of a business". *The American Heritage College Dictionary*, Third Edition. The central computer (52) of Lawlor et al. '501 performs retail banking functions and does not perform bookkeeping as understood by those skilled in the art of accounting. The disclosed central computer (52) is therefore distinct from the presently claimed financial accounting computer.

The central computer (52) and remote terminals (54) of Lawlor et al. '501 are all part of the same system for providing remote retail banking services. The remote terminals (54) are totally reliant on the central computer (52) to function, and they all form part of the same system provided by a single entity (the bank) to its users (customers holding accounts at the bank). In contrast, the presently claimed invention utilizes discrete and separate computers (a financial accounting computer and at least one financial transaction computer) to perform different functions which enable its users to gather and use financial transaction data from disparate sources for accounting purposes without the necessity of re-entering the data into a separate accounting system.

In addition to the above-noted distinctions, there is no interactive access between the central computer (52) of Lawlor et al. '501 and the users of the system as presently claimed. Instead, the users in the Lawlor et al. '501 system interact with the remote terminals (54) in order to conduct retail banking functions through the central computer (52). The entire purpose of the Lawlor et al. '501 remote banking system is for the users of the system to interact with the remote terminals (54) in order to conduct retail banking functions. Lawlor et al. '501 states that:

> . . . the present invention provides dedicated telephone-based banking terminals to users for home or office use ("home banking") (see col. 7, lines 5-7.)

Lawlor et al. '501 further discloses:

> A practical system and method for the remote distribution of financial services (e.g., home banking and bill paying) involves distributing portable terminals to a user base. (see Abstract)

Lawlor et al. '501 thus makes clear that user interaction takes place with the remote terminals (54). In contrast, the user interaction as presently claimed takes place with the financial accounting computer.

The Office Action states that:

> The financial transaction computers 54 [of Lawlor et al. '501] are programmed to provide interactive access to the file of the accounting computer because it is disclosed that there is a security function that requires users to identify themselves by the use of account numbers and a PIN. This is a way to provide interactive access as claimed (means for providing interactive access).

The Examiner is apparently taking the position that interactive access to the central computer (52) is provided through the remote terminals (54). The Examiner is thus combining the central computer (52) and the remote terminals (54) of Lawlor et al. '501 to provide the interactive access with the user as presently claimed. The Examiner is also reading the central computer (52) of Lawlor et al. '501 on the presently claimed financial accounting computer, and is reading the remote terminals (54) of Lawlor et al. '501 on the presently claimed at least one financial transaction computer.

This rejection is respectfully traversed because the financial accounting computer and the financial transaction computer as presently claimed are discrete and distinct elements, with the financial accounting computer being the element with which the user has interactive access, and the financial transaction computer being the element that receives data including electronically recorded financial transactions made between the user and another entity. There is no recitation that the user's interactive access with the financial accounting computer requires the use of the financial transaction computer to do so. Instead, the claims recite that financial transaction data is transferred from the financial transaction computer to the financial accounting computer, and that interactive access is provided between the financial accounting computer and the user so that the user can enter, delete, adjust or process the financial transaction data that was received by the financial accounting computer from the financial transaction computer. Nowhere is it recited that the financial transaction computer is used in combination with the financial accounting computer to provide interactive access between the financial accounting computer and the user.

If the central computer (52) and remote terminals (54) of Lawlor et al. '501 must be combined as suggested in the Office Action to achieve the interactive access between the financial accounting computer and user as presently claimed, then it is inconsistent to also rely on those elements as separately meeting the other features of the claims. Applicant respectfully submits that it is improper for the Examiner to combine the central computer (52) and remote terminals (54) of Lawlor et al. '501 to allegedly read on the "interactive access" feature of the presently claimed invention, and then separate the central computer (52) and remote terminals (54) of Lawlor et al. '501 to allegedly read on the separate "financial accounting computer" and "financial transaction computer" as presently claimed.

The reliance in the Office Action on both the central computer (52) and remote terminals (54) of Lawlor et al. '501 to allegedly meet the presently claimed feature of "interactive access between the financial accounting computer and the user" highlights the fact that the system disclosed by Lawlor et al. '501 is a single system provided by a single entity which relies on the connection of remote terminals to a central computer in order to function. No teaching or suggestion of the presently claimed invention is provided, in which discrete financial accounting and financial transaction computers perform separate functions which allow users to

obtain and use financial transaction data from disparate sources for accounting purposes without having to re-enter the data into another accounting system.

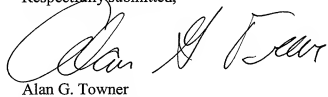
Accordingly, Claims 45, 61, 78, 80, 83, 99, 116 and 118, and the claims that depend therefrom, are patentable over Lawlor et al. '501.

Conclusion

In view of the foregoing remarks, it is submitted that Claims 45-52, 54, 58-70, 74-81, 83-92, 96-108 and 112-119 are patentable over the prior art of record. Accordingly, an early Notice of Allowance of this application is respectfully requested.

In the event that any outstanding matters remain in connection with this application, the Examiner is invited to telephone the undersigned at (412) 263-4340 to discuss such matters.

Respectfully submitted,



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